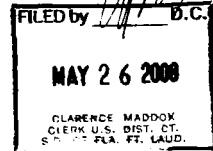


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION

CASE NO. 00-6035-Cr-Zloch



UNITED STATES OF AMERICA, :

Plaintiff, :

v. :

RAYMOND MCDERMOTT and :

MARTHA TREMINIO DIAZ a/k/a :

MARTHA MCDERMOTT, :

Defendants. :

MOTION FOR LEAVE TO TRAVEL

Defendants, Raymond McDermott and Martha Treminio Diaz (a/k/a Martha McDermott), by and through their undersigned counsel, hereby move this Court to grant them permission to travel to Siesta Key, Sarasota, Florida, from Saturday, May 27th to Monday, May 29th, and in support of this Motion would show:

1. Both Defendants are charged by Indictment with assaulting an internationally protected person. Raymond McDermott is charged in an additional count with threatening to assault an internationally protected person.

2. Both Defendants were granted pretrial release. A standing condition of said pretrial release is that they not leave the Southern District of Florida.

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3. Both Defendants have entered into a written Plea Agreement with the government in which they have plead guilty to Count 2 of the Indictment. The case has been scheduled for Sentencing on July 28, 2000 at 9:30 a.m.

4. The Defendants, who are husband and wife, have made plans to drive to Siesta Key, Sarasota, Florida, from Saturday May 27th to Monday, May 29th. If permission to travel is granted, they will be staying at a hotel called "Gulf Sun of Siesta Key" in Sarasota, Florida. The address is 6722 Midnight Pass Road, Sarasota, Florida. The telephone number is (941) 349-2442. The McDermotts plan to drive to the hotel on Saturday, May 27th and return on Monday, May 29, 2000.

5. Undersigned has left various messages for Assistant United States Attorney Debra J. Stuart but has been unable to speak with her.

WHEREFORE, Defendants respectfully move this Court to enter the attached Order granting them permission to travel to Siesta Key, Sarasota, Florida, during the weekend of May 27, 2000.

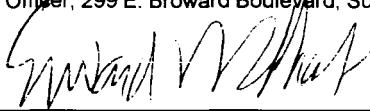
Respectfully submitted

**BIERMAN, SHOHAT,
LOEWY & KLEIN, P.A.**
Attorneys for Defendants
800 Brickell Avenue
Penthouse Two
Miami, Florida 33131
Telephone: (305) 358-7000
Facsimile: (305) 358-4010

By: 
EDWARD R. SHOHAT, ESQ., #152634

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was delivered by facsimile this 25th day of May, 2000, to: Debra J. Stuart, Esq., Assistant United States Attorney, 500 East Broward Boulevard, Suite 700, Ft. Lauderdale, Florida 33394, and to Darwin L. Crenshaw, U. S. Pretrial Service Officer, 299 E. Broward Boulevard, Suite 301, Ft. Lauderdale, FL 33301.

A handwritten signature in black ink, appearing to read 'Edward R. Shohat', is written over a horizontal line.

EDWARD R. SHOHAT, ESQ.